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Commercial Real Estate Exchange, Inc.

ATLAS DATA PRIVACY CORPORATION,

as assignee of individuals who are Covered Persons, JANE DOE-1, a law enforcement officer, JANE DOE-2, a law enforcement officer, SCOTT MALONEY, JUSTYNA MALONEY, and PETER ANDREYEV,

Plaintiffs,

VS.

COMMERCIAL REAL ESTATE EXCHANGE, INC., RICHARD ROES 1-10, fictitious names of unknown individuals and ABC COMPANIES 1-10, fictitious names of unknown entities,

Defendants.

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

CIVIL ACTION NO.

APPLICATION OF COMMERCIAL REAL ESTATE EXCHANGE, INC. FOR AN EXTENSION OF TIME TO ANSWER, MOVE OR OTHERWISE REPLY PURSUANT TO LOCAL RULE 6.1(b)

Pursuant to Local Rule 6.1(b), application is hereby made for a Clerk's Order extending the time within which Commercial Real Estate Exchange, Inc. d/b/a CREXI ("CREXI") may answer, move or otherwise reply to the Complaint filed by Plaintiff. It is represented that:

- 1. No previous extension has been obtained on CREXI's behalf;
- 2. Plaintiff initiated this action by filing a Complaint in the Superior Court of New Jersey, Morris County, Law Division, on February 9, 2024 and served CREXI on February 22, 2024.
 - 3. CREXI removed this action to the District of New Jersey on March 21, 2024.
- 4. Pursuant to Fed. R. Civ. P. 81(c)(2)(C), the time for CREXI to answer, move or otherwise reply would expire on March 28, 2024 (i.e., 7 days after removal to federal court); and
- 5. CREXI applies for an extension of 14 days to answer, move or otherwise reply to Plaintiff's Complaint through April 11, 2024.

Respectfully submitted,

DENTONS US LLP

By: /s/ Stephen M. Turner
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Attorneys for Defendant Commercial Real Estate Exchange, Inc.

Dated: Short Hills, New Jersey March 21, 2024